

1 HONORABLE MARSHA J. PECHMAN
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7 **UNITED STATES DISTRICT COURT**
8 **FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

9 NORTHSHORE SHEET METAL, INC.,
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11 Plaintiff,
12 v.
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14 SHEET METAL WORKERS
15 INTERNATIONAL ASSOCIATION,
16 LOCAL 66,
17 Defendant.

No. 2:15-CV-01349 MJP

**DECLARATION OF TIM CARTER IN
SUPPORT OF DEFENDANT'S
RESPONSE TO PLAINTIFF'S MOTION
TO QUASH OR MODIFY SUBPOENAS
DUCES TECUM**

18 Tim Carter makes the following declaration:

19 1. I am the Business Manager of Sheet Metal Workers International Association,
20 Local 66 ("Local 66").

21 2. Northshore Sheet Metal, Inc. ("Northshore") and Local 66's collective bargaining
22 agreement ("CBA") expired on June 1, 2015. Upon expiration of the CBA, the Union had the
23 right to strike.

24 3. The parties began bargaining for a successor CBA on May 12, 2015.

25 DECLARATION OF TIM CARTER IN
SUPPORT OF DEFENDANT'S RESPONSE
TO PLAINTIFF'S MOTION TO QUASH OR
MODIFY SUBPOENAS DUCES TECUM –
2:15-cv-01349 MJP - 1

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4. At the May 25, 2015 bargaining session, I stated to Jeff Meyer, Northshore's co-owner, that the Union would not agree to Northshore's request to extend the CBA because the Union would not waive its right to strike.

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6 I declare under penalty of perjury of the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

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9 SIGNED in Seattle, Washington this 6th day of January, 2016.
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Tim Carter
Business Manager
Sheet Metal Workers International
Association, Local 66

DECLARATION OF TIM CARTER IN
SUPPORT OF DEFENDANT'S RESPONSE
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